

THE URBAN LAW FIRM

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Counsel for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TRUSTEES OF THE BRICKLAYERS &
ALLIED CRAFTWORKERS LOCAL 13
DEFINED CONTRIBUTION PENSION
TRUST FOR SOUTHERN NEVADA;
TRUSTEES OF THE BRICKLAYERS &
ALLIED CRAFTWORKERS LOCAL 13
HEALTH BENEFITS FUND; TRUSTEES
OF THE BRICKLAYERS & ALLIED
CRAFTWORKERS LOCAL 13 VACATION
FUND; BRICKLAYERS & ALLIED
CRAFTWORKERS LOCAL 13 NEVADA;
TRUSTEES OF THE BRICKLAYERS &
TROWEL TRADES INTERNATIONAL
PENSION FUND; TRUSTEES OF THE
BRICKLAYERS & TROWEL TRADES
INTERNATIONAL HEALTH FUND; and
TRUSTEES OF THE INTERNATIONAL
MASONRY INSTITUTE,

Plaintiffs,

vs.

PEGASUS MARBLE, INC., a Nevada
corporation; CYGNUS LLC, a Nevada
limited liability company; and GAGIK
ZARGARYAN, an individual,

Defendants.

CASE NO: 2:20-cv-00224-GMN-BNW

**JOINT STIPULATION PERMITTING
PLAINTIFFS TO AMEND COMPLAINT**

Plaintiffs, TRUSTEES OF THE BRICKLAYERS & ALLIED CRAFTWORKERS LOCAL 13
DEFINED CONTRIBUTION PENSION TRUST FOR SOUTHERN NEVADA; TRUSTEES OF THE
BRICKLAYERS & ALLIED CRAFTWORKERS LOCAL 13 HEALTH BENEFITS FUND;

1 TRUSTEES OF THE BRICKLAYERS & ALLIED CRAFTWORKERS LOCAL 13 VACATION
2 FUND; BRICKLAYERS & ALLIED CRAFTWORKERS LOCAL 13 NEVADA; TRUSTEES OF THE
3 BRICKLAYERS & TROWEL TRADES INTERNATIONAL PENSION FUND; TRUSTEES OF THE
4 BRICKLAYERS & TROWEL TRADES INTERNATIONAL HEALTH FUND; and TRUSTEES OF
5 THE INTERNATIONAL MASONRY INSTITUTE, by and through their counsel of record, and
6 Defendants, PEGASUS MARBLE, INC., a Nevada corporation; CYGNUS LLC, a Nevada limited
7 liability company; and GAGIK ZARGARYAN, an individual, by and through their counsel, jointly
8 stipulate to permit the Plaintiffs to amend their complaint in this case.

9 Under Federal Rule of Civil Procedure 15(a)(2), a party may amend its pleading with consent of
10 the opposing party. Fed. R. Civ. P. 15(a)(2). Defendants consent to allow Plaintiffs to amend their
11 complaint. Plaintiffs proposed amended complaint is attached hereto as Exhibit 1.

12
13 Dated: August 12, 2020

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/s/ Nathan R. Ring

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Counsel for Plaintiffs

21 Dated: August 12, 2020

LAW OFFICE OF DANIEL MARKS

22 **The stipulation is granted.**
23 **Further, it is ordered that ECF**
No. 14 is DENIED as moot.

/s/ Adam Levine

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Counsel for Defendants

24 IT IS SO ORDERED

25 DATED: 9:50 am, August 14, 2020

26 

27 BRENDA WEKSLER
28 UNITED STATES MAGISTRATE JUDGE